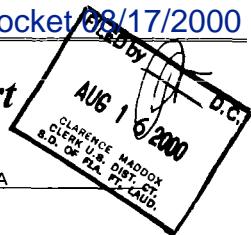


United States District Court



SOUTHERN

DISTRICT OF

FLORIDA

UNITED STATES OF AMERICA

V.

RAMIN BAHARMAST and
DAVID APPLEGATE

CRIMINAL COMPLAINT

CASE NUMBER: 00-4201-5-NS-CW

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about AUGUST 15, 2000 in BROWARD county, in the

Southern District of Florida defendant(s) did, (Check Statutory Language of Offense)

knowingly and willfully, CONSPIRE TO TRANSFER AND DELIVER FALSE AND COUNTERFEITED OBLIGATIONS OF THE UNITED STATES, THAT IS, APPROXIMATELY (\$187,000) IN COUNTERFEIT FEDERAL RESERVE NOTES IN ONE HUNDRED DOLLAR (\$100) DENOMINATIONS WITH THE INTENT THAT THE SAME BE PASSED, PUBLISHED AND USED AS TRUE AND GENUINE,

in violation of Title 18 United States Code, Section(s) 371 and 473

I further state that I am a(n) Special Agent
Official Title and that this complaint is based on the following facts:

Please see attached affidavit.

Continued on the attached and made a part hereof: Yes No

Signature of Complainant

ANGELA A. CONDE

US SECRET SERVICE SPECIAL AGENT

Sworn to before me, and subscribed in my presence,

at FORT LAUDERDALE, FLORIDA

AUGUST 16, 2000

Fort Lauderdale, Florida

Date

City and State

LURANA S. SNOW
UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer

Lurana S. Snow
Signature of Judicial Officer

AFFIDAVIT

I, ANGELA A. CONDE, being duly sworn, depose and say:

1. I am a Special Agent with the United States Secret Service (USSS) and have been so employed since December, 1998. I am currently assigned to the Miami Field Office of the USSS and my duties include, among other things, the investigation of counterfeit United States Federal Reserve Notes (currency).

2. This affidavit is based upon my personal knowledge and information which has been provided to me by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of showing probable cause for a complaint, it does not include all the details of the investigation of RAMIN BAHARMAST and DAVID APPLEGATE

3. During an ongoing United States Secret Service and Drug Enforcement Administration investigation, information was provided by a reliable confidential informant of an individual arriving in the South Florida area with counterfeit U.S. currency.

4. On August 15, 2000, Special Agents of the United States Secret Service and Drug Enforcement Administration Task force conducted surveillance on RAMIN BAHARMAST and observed him meeting with DAVID APPLEGATE at approximately 2:30 PM in the Boca Raton area. During the meeting an exchange of some sort of packaging was observed by surveillance agents. RAMIN BAHARMAST was then observed

departing the meeting and driving south to the Coconut Creek area. USSS and DEA agents following BAHARMAST observed the subject examining U.S. Federal Reserve Notes, whereupon a traffic stop was conducted by the City of Coconut Creek Police Department.

5. RAMIN BAHARMAST consented to a vehicle search. During the search, \$12,000.00 in counterfeit U.S. Federal Reserve Notes were recovered hidden in the back lining of the driver seat. The counterfeit Federal Reserve Notes were wrapped in a plastic seran wrap.

6. RAMIN BAHARMAST was placed under arrest for possession of counterfeit U.S. currency. Post-Miranda, BAHARMAST admitted to having met with a second subject, DAVID APPLEGATE and receiving \$4,500.00 in genuine U.S. currency as payment for APPLEGATE'S purchase of \$15,000.00 in counterfeit currency earlier in the morning on August 15, 2000. BAHARMAST also provided the Agents consent to search his residence in Boca Raton and admitted to having an additional \$160,000.00 in counterfeit in a Self Storage warehouse. HABARMAST consented verbally and lead Agents to the storage warehouse where the additional \$160,000.00 in counterfeit was recovered inside a black attache briefcase. BAHARMAST stated that DAVID APPLEGATE had negotiated to receive an additional amount of counterfeit . Thereafter BAHARMAST contacted APPLEGATE via a

consenually monitored telephone call and arranged a meeting in order to provide APPLEGATE with the additional \$160,000.00 in counterfeit U.S. Federal Reserve Notes.

7. On August 15, 2000, USSS and DEA Task Force Agents set up surveillance at the arranged meeting place between BAHARMAST and APPLEGATE. APPLEGATE was observed arriving at the location and was place under arrest.

8. Post-Miranda APPLEGATE admitted to meeting with BAHARMAST in the morning of August 15, 2000 and receiving \$15,000.00 in counterfeit U.S. Federal Reserve Notes. APPLEGATE stated he met BAHARMAST in the afternoon of August 15, 2000, at approximately 2:30 PM and paid BAHARMAST \$4,500.00 for the counterfeit Federal Reserve Notes he received. APPLEGATE stated he sold the counterfeit \$15,000 in U.S. Federal Reserve Notes earlier this same date.

9. In view of the foregoing, I submit there is probable cause to believe that on August 15, 2000, in Ft. Lauderdale, Broward County in the Southern District of Florida, RAMIN BAHARMAST and DAVID APPLEGATE, did willfully and knowingly possess and conspire to distribute counterfeit U.S. Federal Reserve Notes and

securities in violation of Title 18, United States Code, Section 371 and 473.

AFFIANT SAYETH FURTHER NAUGHT.

Angela A. Conde
ANGELA A. CONDE, SPECIAL AGENT
UNITED STATES SECRET SERVICE

Subscribed and sworn to before me this 16⁹¹ day of August, 1999.

Lurana S. Snow
LURANA S. SNOW
UNITED STATES MAGISTRATE JUDGE